

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

Attly adm
BY *[Signature]* *[Signature]* ORIGINAL
Index No.: 08 CIV 4704 (SHS) (THK)

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OSWALDO CRUZ,
MARY MARTHA LITTLEJOHN, and
ROBERT GREG WINN, on behalf of
themselves and a class of those similarly
situated,

Plaintiffs,

-against-

**MOTION TO ADMIT
COUNSEL *PRO HAC VICE***

LAWSON SOFTWARE, INC.,
LAWSON SOFTWARE AMERICAS, INC.,

Defendants.
-----X

Pursuant to Rule 1.3(c) of the Local Rules of the United States District Courts for the Southern and Eastern Districts of New York, I, Loretta M. Gastwirth, Esq. a member of Meltzer, Lippe, Goldstein & Breitstone, LLP, local counsel to defendants in this action, and a member in good standing of the bar of this Court, hereby move for an Order allowing the admission *pro hac vice* to represent defendants Lawson Software, Inc., and Lawson Software Americas, Inc. for all purposes, of:

Sara Gullickson McGrane, Esq.
Felhaber, Larson, Fenlon & Vogt, P.A.
220 South Sixth Street, Suite 2200
Minneapolis, MN 55402-4504
Telephone: 612-373-8511
Fax: 612-338-0535
smcgrane@felhaber.com

Sara Gullickson McGrane, Esq. is a member in good standing of the Bar of the States of Minnesota, North Dakota and Colorado.

JUN 20 2008

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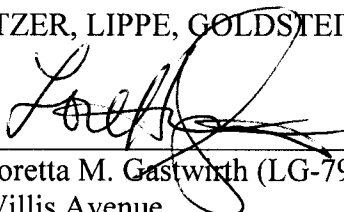
FILED
JUN 20 2008

There are no pending disciplinary proceedings against Sara Gullickson McGrane in any State or Federal court.

Dated: June 18, 2008
Mineola, New York

Respectfully submitted,

MELTZER, LIPPE, GOLDSTEIN & BREITSTONE, LLP

By: 
Loretta M. Gastwirth (LG-7968)
190 Willis Avenue
Mineola, New York 11501
Tel: (516) 747-0300
Fax: (516) 237-2893
lgastwirth@meltzerlippe.com

Attorneys for Defendants

To: Christine E. Webber, Esq.
Llezie Green Coleman, Esq.
COHEN MILSTEIN HAUSFELD & TOLL, PLLC
1100 New York Avenue, NW, Suite 500
Washington, DC 20005
Tel: (202) 408 4600

Clayton D. Halunen, Esq.
Charles V. Firth, Esq.
HALUNEN & ASSOCIATES
220 South Sixth Street, Suite 2000
Minneapolis, MN 55402
Tel: (612) 605-4098
Attorneys for Plaintiffs

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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STATE OF NEW YORK)
) ss.:
COUNTY OF NASSAU)

Index No.: 08 CIV 4704 (SHS) (THK)

**AFFIDAVIT OF
LORETTA M. GASTWIRTH
IN SUPPORT OF MOTION TO
ADMIT COUNSEL *PRO HAC VICE***

Loretta M. Gastwirth, being duly sworn, deposes and says as follows:

1. I am a member of the law firm Meltzer, Lippe, Goldstein & Breitstone, LLP, local counsel for defendants Lawson Software, Inc. and Lawson Software Americas, Inc. ("Lawson") in the above-captioned action and I am fully familiar with the proceedings in this case. I make this statement based on my personal knowledge of the facts set forth herein and in support of defendants' motion to admit Sara Gullickson McGrane, Esq. as counsel *pro hac vice* to represent defendants Lawson in this matter for all purposes.

2. I am a member in good standing of the bar of the State of New York, and was admitted to practice law in 1984. I am also admitted to the bar of the United States District Courts for the Southern, Northern and Eastern Districts of New York, Second Circuit Court of Appeals and the United States Supreme Court and am in good standing with this Court.

3. I have recently come to know Sara Gullickson McGrane when my firm was retained in this case to act as local counsel on behalf of our client Lawson.

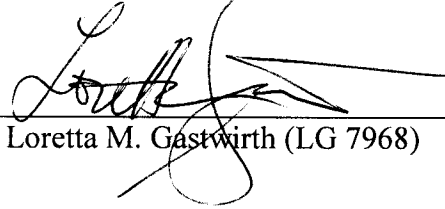
4. Sara Gullickson McGrane, Esq. is a shareholder of Felhaber Larson Fenlon & Vogt, P.A., a prominent law firm located in Minneapolis, Minnesota. She is a member in good standing of the Bar of the States of Minnesota, North Dakota and Colorado. There are no pending disciplinary proceedings against Sara Gullickson McGrane in any State or Federal court. Copies of her Certificates of Good Standing for the State Courts of Minnesota, North Dakota and Colorado are annexed hereto collectively as Exhibit A.

5. I have found Sara Gullickson McGrane, Esq. to be a skilled attorney and a person of integrity. She is an experienced litigator who has handled many matters in both the federal and state courts of many states. Ms. McGrane has significant experience in handling class action and multi-party litigation and practices litigation with an emphasis on employment law. Ms. McGrane is highly experienced in federal practice and is familiar with the Federal Rules of Civil Procedure. She has or will also become familiar with the Local Rules of the United States District Court for the Southern District of New York and the individual rules of Judge Stein and Magistrate Judge Katz.

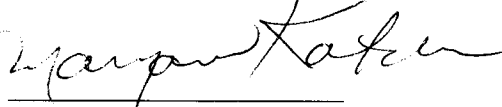
6. Accordingly, I am pleased to move the admission of Sara Gullickson McGrane, Esq., *pro hac vice*, for all purposes.

7. I respectfully submit a proposed order granting the admission of Sara Gullickson McGrane, Esq., *pro hac vice*, for all purposes which is attached hereto as Exhibit B.

WHEREFORE, it is respectfully requested that the motion to admit Sara Gullickson McGrane, *pro hac vice*, for all purposes to represent defendants in the above captioned matter, be granted.


Loretta M. Gastwirth (LG 7968)

Sworn to before me this
18th day of June, 2008


Notary Public

MARYANN KATCHEN
NOTARY PUBLIC, STATE OF NEW YORK
NO. 4891017
QUALIFIED IN QUEENS COUNTY
CERTIFICATE FILED IN NASSAU COUNTY
COMMISSION EXPIRES 5/27/11

STATE OF MINNESOTA IN SUPREME COURT

Certificate of Good Standing

This is to certify that the following lawyer is in good standing.

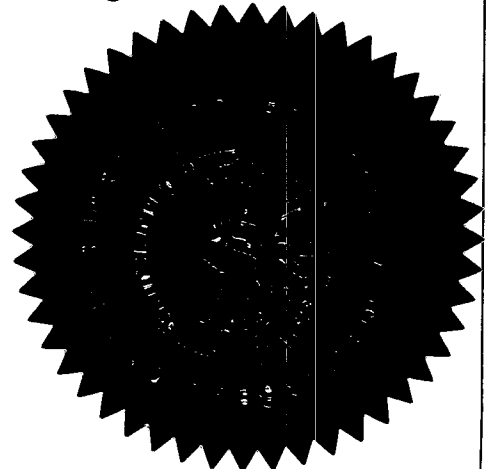
SARA GULLICKSON MCGRANE

was duly admitted to practice as a lawyer and counselor at law in all the courts of this state on

December 04, 1992

Given under my hand and seal of this court on

June 06, 2008



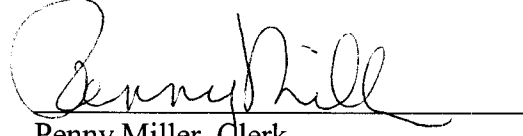
Fredrick K. Grittner

Fredrick K. Grittner
Clerk of Appellate Courts

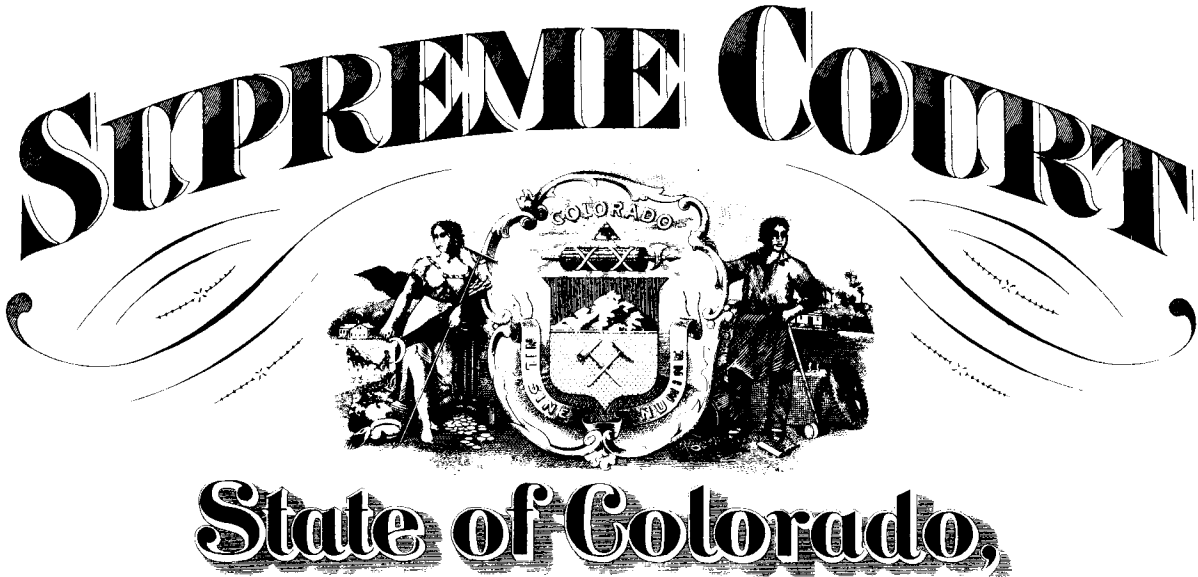
IN THE SUPREME COURT)
STATE OF NORTH DAKOTA)

I, Penny Miller, Clerk of the Supreme Court within and for the State of North Dakota, do hereby certify that Sarah Gullickson McGrane was duly admitted as an attorney and counselor of the Supreme Court of the State of North Dakota, the highest court of record in the State of North Dakota, at a regular session of the Supreme Court, held at Bismarck, Burleigh County, North Dakota, on the 10th day of October, 1991. Ms. McGrane is at this date licensed to practice law in North Dakota and is, therefore, authorized to appear before this Court and all other North Dakota Courts.

IN TESTIMONY WHEREOF, I have hereunto set my hand and affixed the Seal of said Court, at the City of Bismarck, this 3rd day of June, 2008.


Penny Miller, Clerk
North Dakota Supreme Court

(SEAL)



STATE OF COLORADO, ss:

I, Susan J. Festag Clerk of the Supreme Court of the State of
Colorado, do hereby certify that

SARA GULLICKSON MCGRANE

has been duly licensed and admitted to practice as an

ATTORNEY AND COUNSELOR AT LAW

*within this State; and that his/her name appears upon the Roll of Attorneys
and Counselors at Law in my office of date the* 22nd

day of October *A. D.* 1990 *and that at the date hereof*

the said **SARA GULLICKSON MCGRANE**

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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OSWALDO CRUZ,
MARY MARTHA LITTLEJOHN, and
ROBERT GREG WINN, on behalf of
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Plaintiffs,

-against-

LAWSON SOFTWARE, INC.,
LAWSON SOFTWARE AMERICAS, INC.,

Defendants.

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Index No.: 08 CIV 47047 (SHS) (THK)

**ORDER FOR ADMISSION
PRO HAC VICE
ON WRITTEN MOTION**

Upon the motion of Meltzer, Lippe, Goldstein & Breitstone, LLP, attorneys for defendants, Lawson Software, Inc., and Lawson Software Americas, Inc., and the sponsoring attorney's affidavit of Loretta M. Gastwirth, Esq. in support;

IT IS HEREBY ORDERED that

Sara Gullickson McGrane, Esq.
Felhaber, Larson, Fenlon & Vogt, P.A.
220 South Sixth Street, Suite 2200
Minneapolis, MN 55402-4504
Telephone: 612-373-8511
Fax: 612-338-0535
smcgrane@felhaber.com

is admitted to practice *pro hac vice* for all purposes as counsel for defendants Lawson Software, Inc. and Lawson Software Americas, Inc. in the above-captioned case pending in the United States District Court for the Southern District of New York. All attorneys appearing before this Court are subject to the Local Rules of this Court, including the Rules governing discipline of attorneys. If this action is assigned to the Electronic Case Filing (ECF) system, counsel shall

immediately apply for an ECF password at nysd.uscourts.gov. Counsel shall forward the *pro hac vice* fee to the Clerk of the Court.

Dated:

United States District/Magistrate Judge

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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AFFIDAVIT OF SERVICE

-against-

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STATE OF NEW YORK)
) ss.:
COUNTY OF NASSAU)


Deborah L. Frascino, being duly sworn, deposes and says, I am not a party to this action; I am over 18 years of age and I reside in New York in the County of Nassau.

On June 18, 2008, I served the within **Motion to Admit Counsel *Pro Hac Vice* with Supporting Affidavit and Proposed Order**, by depositing a true copy thereof, enclosed in a wrapper addressed as shown above, into the custody of Federal Express for overnight delivery, prior to the latest time designated by that service for overnight delivery upon:

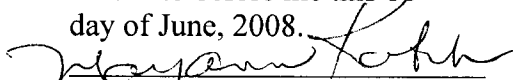
Christine E. Webber, Esq.
Liezlie L. Green, Esq.
COHEN MILSTEIN HAUSFELD & TOLL, PLLC
1100 New York Avenue, NW, Suite 500
Washington, DC 20005

Clayton D. Halunen, Esq.
Charles V. Firth, Esq.
HALUNEN & ASSOCIATES
220 South Sixth Street, Suite 2000
Minneapolis, MN 55402

Craig R. Benson, Esq.
LITTLER MENDELSON, P.C.
885 Third Avenue, 16th Floor
New York, New York 10022


Deborah L. Frascino

Sworn to before me this 18th
day of June, 2008.


Notary Public

435998-1

MARYANN KATCHEN
NOTARY PUBLIC, STATE OF NEW YORK
NO. 4891017
QUALIFIED IN QUEENS COUNTY
CERTIFICATE FILED IN NASSAU COUNTY
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Washington, DC 20005

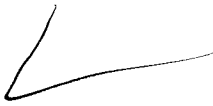
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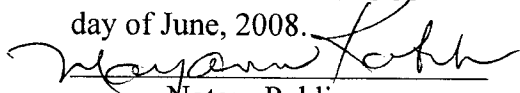
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BY  

AFFIDAVIT OF SERVICE

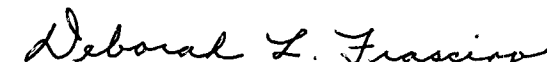


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Notary Public

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